



NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL

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March 29, 2011

The Honorable Julius Genachowski  
Chairman, Federal Communications Commission  
Office of the Commissioners  
445 12th Street, S.W., Room 8B201  
Washington, D.C. 20554

**Subject: Docket No. WT 10-4**

Dear Mr. Chairman:

The National Public Safety Telecommunications Council (NPSTC) is a federation of public safety organizations whose mission is to improve public safety communications and interoperability through collaborative leadership. NPSTC pursues the role of resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. Accordingly, NPSTC provides guidance on issues that can either negatively impact or benefit the operation of public safety communications.

On March 17, 2011, the Commission issued a news release announcing the tentative agenda for its April 7, 2011 open meeting. That tentative agenda included the following item:

- **Signal Boosters Declaratory Ruling, NPRM, and Order:** A Declaratory Ruling, NPRM and Order that helps to fill gaps in wireless coverage and expands broadband in rural and difficult-to-serve areas, while protecting wireless networks from harm.

Signal boosters are used legitimately by the public safety community on its own systems under the provisions of section 90.219 of the rules. Separately, use of signal boosters on commercial systems are authorized under section 22.527 of the rules. Because of the proximity of some commercial frequency bands to some public safety bands, signal boosters improperly designed and/or improperly installed can cause interference to public safety operations.

NPSTC has been advised that the Commission is considering allowing the general public to install and operate signal boosters in connection with commercial systems without the specific authority of the applicable commercial operator, at least on an interim basis until rules are

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finalized. NPSTC was advised that such interim use would require that signal boosters be designed with automatic gain control and oscillation detection.

Technical experts in the signal booster manufacturing and commercial operator communities have advised NPSTC that such boosters can still interfere with public safety operations if improperly installed. Given that the general public is not normally versed in engineering best practices for such installations, NPSTC recommends that such use of signal boosters without the specific authorization from the applicable commercial operator not be allowed, even on an interim basis. NPSTC believes that such unauthorized use, even on an interim basis could significantly increase the potential for signal boosters to cause interference to public safety networks. Even where there is no interference, installation of unauthorized boosters by the public that are not recognized by commercial networks might undermine the use of E911 by preventing the accurate determination of location information.

As noted above, separate from any general public use of signals boosters on commercial networks, the public safety community deploys signal boosters in their own networks. Public safety agencies rely on the authorized use of signal boosters on their own networks to fill in otherwise weak signal areas. Use of signal boosters on public safety networks is normally designed into the network up front or as required, added to an existing network. In the rulemaking referenced above, we recommend the Commission separate any issues regarding the legitimate operations of public safety signal boosters from the general public's use of signal boosters on commercial networks.

NPSTC appreciates your attention to this matter.

Respectfully submitted,



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